

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SYMMETRY PRODUCTS GROUP,	:
Plaintiff,	:
- against -	:
IRON WORKERS LOCAL UNION NO.	:
417, IRON WORKS LOCALS 40, 361	:
& 417 UNION SECURITY FUNDS,	:
Defendant.	:
-----X	

Civil Action No.: 08-CV-3183

ANSWER

Respondents, **IRON WORKERS LOCAL UNION NO. 417**, ("LOCAL 417" or "UNION"), **IRON WORKERS LOCALS 40, 361 and 417 UNION SECURITY FUNDS** ("FUNDS") by their attorney, **COLLERAN, O'HARA & MILLS L.L.P.**, hereby ANSWER the allegations contained in the Amended Petition of **SYMMETRY PRODUCTS GROUP** ("SYMMETRY") as follows:

FIRST: Admit the allegations contained in the FIRST paragraph, except denies any knowledge or information sufficient to form a belief as to Petitioner's business operations. Upon information and belief, Petitioner is in the construction industry.

SECOND: Admit the allegations contained in the SECOND paragraph.

THIRD: Admits that the Union delivered an Agreement that, when executed by Petitioner bound it to the terms and conditions of the CBA.

FOURTH: Deny knowledge or information sufficient to form a belief as to the allegations contained in the FOURTH paragraph except that the individual who executed the CBA, Gloria Fornier, represented that she was authorized and thereafter, for a time, Petitioner acted in conformity with the CBA.

FIFTH: Admit the allegations contained in the FIFTH paragraph.

SIXTH: Admit the allegations contained in the SIXTH paragraph.

SEVENTH: The allegations contained in the SEVENTH paragraph are a recitation of a statute that is in applicable herein.

EIGHTH: Deny the allegations contained in the EIGHTH paragraph.

NINTH: Deny the allegations contained in the NINTH paragraph as Petitioner sought, and was granted at least one adjournment of the arbitration hearing.

TENTH: Deny the allegations made in the TENTH paragraph.

ELEVENTH: Admit that Steven Lancia contacted Colleran, O'Hara & Mills L.L.P. and deny all other claims made in the ELEVENTH paragraph.

TWELFTH: Admit that Colleran, O'Hara & Mills L.L.P. intends to move forward in obtaining a judgment against Petitioner and deny all other claims made in the TWELFTH paragraph.

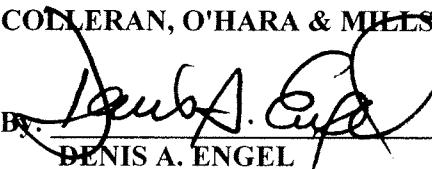
THIRTEENTH: Deny all allegations contained in the THIRTEENTH paragraph.

FOURTEENTH: Admit the allegations made in the FOURTEENTH paragraph.

Dated: Garden City, New York
April 14, 2008

COLLERAN, O'HARA & MILLS L.L.P.

By:


DENIS A. ENGEL

Attorney for Defendant
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TO: **TOM LANCIA, ESQ.**
Attorney for Plaintiff
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